

**Osage Operators Environmental Reference Manual Update Process
Kick-Off Public Meeting**

**February 20, 2014
6:30 to 8:30 PM**

**Osage Cultural Center, Pawhuska, Oklahoma
Meeting Summary**

Welcome and Opening Remarks

Tushar Kansal, facilitator from the Consensus Building Institute, opened the meeting and thanked participants for attending. Officials from the Osage Minerals Council, the US Environmental Protection Agency, and the US Bureau of Indian Affairs introduced themselves. A full list of individuals in attendance can be found in Appendix A.

Mr. Eddie Streater, US Bureau of Indian Affairs (BIA), noted that most attendees in the room also came to meetings held as part of the Osage Negotiated Rulemaking that took place in 2013. He explained that the current process is different from the negotiated rulemaking, both in purpose and in process. The focus of the current process is to update the Operators Manual, and the associated Handbook, that EPA first created in 1997. Since that time, the laws, rules, technology, and concerns have changed, and it behooves everyone to update the documents accordingly. He thanked everyone for attending the meeting and for participating in the process. Mr. Streater also reviewed the meeting agenda.

Mr. Sam Coleman, US Environmental Protection Agency (EPA), opened by sharing greetings from the Regional Administrator of EPA's Region 6 Office, Ron Curry. Mr. Coleman recounted that, in 1997, EPA was engaged in various issues in Osage County and the idea came up to create a Manual and Handbook so that oil and gas operators could have all of the information that they need in one place. The Manual and Handbook consolidate information from various government agencies and present clear-language interpretations of regulations. Mr. Coleman echoed Mr. Streater's comments in saying that much has changed over the past seventeen (17) years since the documents were first written, and those documents probably should have undergone periodic updates and revisions. Now, EPA and BIA would like to incorporate the knowledge and perspectives of the various people in the room, and others, to update these documents. Mr. Coleman stated that these perspectives are very important to the EPA, the BIA, and the Osage Minerals Council, and that these bodies would like to find ways to synthesize the

various perspectives that are present on different issues to find a common ground and best practices that can be incorporated into the Manual and Handbook.

Mr. Andrew Yates, Osage Minerals Council, welcomed all attendees to the Wah Zha Zhi Cultural Center. He held up a copy of the 1997 Operators Handbook and noted that he contributed to the section of that handbook on underground injection control wells and that he has handed out copies of the Handbook to operators and others since it was published. Mr. Yates noted that much has changed about the oil and gas industry, and about Osage County, since 1997, particularly with regard to safety and environmental standards and expectations. The Manual and Handbook were originally developed for use by operators, but the current process seeks to create a level playing field for surface owners also, including both the large nationally-affiliated surface owners and small landowners and Osage headright holders. Mr. Yates closed by emphasizing that the revision of the Handbook is a cooperative endeavor and expressed his appreciation that the various parties in attendance at the meeting were present to contribute and participate.

Purpose and Scope of Manual and Update Process

Mr. Coleman, EPA, spoke about the purpose of the manual update process. He said that energy independence is an important goal and that it is also important that oil and natural gas development not come at the expense of the environment and public health and wellbeing. EPA would like to conduct the process in a way that brings the thoughts and ideas of the stakeholders in the room, and others, to the table. He noted that the regulations tend to focus on rules for down hole operations (that is, those aspects of the development process that take place underground) and that the Manual and Handbook would also look at surface issues. Mr. Coleman recognized and appreciated the presence of representatives from Oklahoma state agencies: Mr. Tim Baker, Oklahoma Corporation Commission, and Mr. Lloyd Kirk, Oklahoma Department of Environmental Quality.

Ms. Christina Kracher, EPA, added that the Manual update is intended to create a useful document that can serve as a resource for producers, cattlemen and other surface owners, restricted landowners and headright holders, and other members of the public. She explained that the present (February 20) meeting was a kick-off meeting for the process and she noted that a series of meetings would be held going forward, including both additional public meetings (similar to the February 20th meeting) and focused stakeholder-consultation meetings with the Osage County Cattleman's Association, the Osage Producer's Association, and with Osage headright holders and restricted landowners.

Ms. Vanessa Ray-Hodge, Department of the Interior Solicitor's Office, explained the scope of the Manual update process. She recounted that the Negotiated Rulemaking ("Reg-Neg") was an official committee set up under the Federal Advisory Committee Act (FACA) and was created to reach agreement on revisions to a set of formal federal regulations governing gas and oil operations in Osage County. To create that FACA committee, approval from the Department of the Interior and the Office of Management and Budget was required. There are limitations on how many FACA committees can operate simultaneously as well as numerous administrative obligations that must be taken under FACA. The Negotiated Rulemaking committee sought to reach as much consensus as possible before the regulations were taken over to the Department of the Interior to review, put out for public comment, and to finalize the regulations. In other words, that was a consensus-seeking process to the greatest extent possible.

Ms. Ray-Hodge explained that, because the current process is not a FACA process, the meetings have to be run carefully to avoid triggering FACA requirements. Most importantly, EPA and BIA are not seeking to reach an official consensus with members of the public or specific stakeholder groups. Instead, EPA and BIA are taking public input and public comment and providing an opportunity for dialogue. That being said, however, Ms. Ray-Hodge articulated an aspiration for the various public stakeholders to reach as much commonality as possible with the help of the facilitators from the Consensus Building Institute (CBI). CBI can work with different stakeholder groups and identify those areas where more dialogue needs to take place and further work needs to be done. EPA and BIA cannot do that directly, but they are hoping that CBI can help bring the parties closer together. Ms. Ray-Hodge said that, to this end, CBI will be having conversations between the official stakeholder meetings.

Ms. Ray-Hodge also advised that the current process would be conducted under the current regulations that are in effect. The proposed regulations that were created in draft as part of the Negotiated Rulemaking are still under review, not finalized and may still be revised by the Department of the Interior post the public comment. So participants in the current Handbook revision process should work from the current regulations. Ms. Ray-Hodge also cautioned that the current process would not create new regulations, as was done during the Negotiated Rulemaking. All regulations must be created through formal processes. Rather, the purpose of the Manual and Handbook is to take some of the regulations and rules and make them more concrete and easily understandable to the users. In some cases where the regulations are somewhat vague, there is some leeway to interpret the regulations and specify how one would best comply with them. To that end, EPA and BIA are soliciting input from producers, landowners and cattlemen, and others to identify best management practices as to how producers should be operating in Osage County. As the process moves forward, the agencies

are going to look to different sources, including the State of Oklahoma, as to how the current regulations should be interpreted.

Lastly, Ms. Ray-Hodge noted that information about all future meetings, including dates, times, locations, and invited parties, would be posted on the BIA's website for the operator's manual update process: www.bia.gov/OsageOperatorsManual (please note that the address is case-sensitive).

Timeline and Engagement with Stakeholders

Mr. Tushar Kansal, Consensus Building Institute (CBI) and meeting facilitator, reviewed the Guidelines governing the public engagement process of the Operators Manual update process, reviewed general themes garnered from recent conversations with key stakeholders, and introduced the public comment and question and answer portion of the meeting. The Guidelines are available at the following URL:

<http://bia.gov/cs/groups/xregeasternok/documents/text/idc1-025587.pdf>.

Mr. Kansal recounted that revision of the Manual is intended to provide guidance on how to comply with current environmental laws and regulations governing oil and gas operations in Osage County and to clarify which agencies should be contacted in the event someone has concerns regarding those gas and oil operations. Stakeholders will provide individual advice and guidance that will be taken into account by the US EPA, BIA, and the Osage Minerals Council in revising and updating the manual. Upon completion of the manual BIA and EPA will develop a shorter Handbook, based on the Manual, for ease of use in the field. Mr. Kansal explained that, although their names are sometimes used interchangeably, there are two separate documents: a Manual and a Handbook. The Manual is a longer document while the Handbook is a shorter version of the Manual that is designed for daily reference and work in the field.

Mr. Kansal pointed participants towards the list of stakeholder who will participate in the process:

- The Osage Minerals Council (all members)
- Representatives of the Osage Nation
- The U.S. Environmental Protection Agency
- The U.S. Bureau of Indian Affairs
- Interested headright holders and restricted landowners
- The Osage Producers Association, its interested members, and its technical consultants

- The Osage Cattlemen's Association, its interested members, and its technical consultants
- The general public.

Mr. Kansal also outlined the schedule of meetings that are to take place as part of the manual update process:

- Introductory public meeting, February 20th, 6:30 to 8:30 PM, Osage Cultural Center, Pawhuska, OK
- Stakeholder meetings, March 3, 4 and 5th, various times, Skiatook Casino, Skiatook, OK
- Mid---course public meeting, April 29th, 6:30 PM start, Osage Culture Center, Pawhuska, OK
- Stakeholder meetings, May 12, 13 and 14th, various times, location to be determined
- Closing public meeting, June 17, time and location to be determined

Mr. Kansal noted that, in addition to public meetings, the process would include targeted stakeholder meetings with producers in Osage County, cattlemen in Osage County, and headright holders and restricted landowners.

Mr. Kansal recounted that meetings agenda for each meeting would be posted on the BIA's website for the Operator's Manual update process at least two days ahead of each meeting, as would all meeting materials, including meeting agendas, meeting summaries, and the draft revised manual. The Consensus Building Institute (CBI), as facilitator of the public engagement process, will prepare meeting summaries of each meeting. He also noted that, while public meetings are open to the public and to the media, under the right of the Tribe to circumscribe such activities, filming, videotaping, or any form of live feed will not be allowed in order to encourage open, constructive, and problem-solving dialogue. Mr. Kansal also explained as the process facilitator, CBI may use any number of techniques to help ensure that everyone has the opportunity to speak, that comments are kept to a reasonable length of time, and that subjects under discussion are provided sufficient time and focus for progress.

Mr. Kansal highlighted key participant and facilitator responsibilities. He noted that participants are expected to focus their comments on the Manual and to refrain from taking time from the process to comment on other, non-related gas and oil activities, regulations, or management of gas and oil operations in Osage County. Participants are also expected to seek to identify not only problems, but also solutions, and to work in a constructive and problem solving manner. Participants are also expected to keep their comments respectful and positive and to refrain

from personal attacks, name-calling, or racially based comments. Mr. Kansal also noted that, in addition to the facilitator responsibilities already mentioned, facilitators will abide by the Ethical Standards of the Association of Conflict Resolution. In part, these standards require that: “The neutral must maintain impartiality toward all parties. Impartiality means freedom from favoritism or bias either by word or by action and a commitment to serve all parties as opposed to a single party.” CBI, the facilitator, will be available to consult confidentially with participants during or between meetings. Facilitators, if asked, are required to hold confidences.

Mr. Kansal noted that the process is expected to conclude on or before July 1, 2014.

Finally, Mr. Kansal summarized key themes heard in recent conversations that CBI had with members of the Osage Producers Association and members of the Osage County Cattlemen’s Association. He recounted that parties had expressed support for updating the Manual and Handbook and appreciation for being invited to participate in the update process. They also expressed concern that the process be given sufficient time to fully incorporate all perspectives. Mr. Kansal noted that some stakeholders would like the Manual to align closely with the rules and regulations on the books and therefore, refrain from further restricting or constraining development operations, while some stakeholders would like the Manual to address key areas of concern including spills, debris, and hydrogen sulfide (H₂S).

Public Comment

The facilitator, Mr. Kansal, provided guidelines for making public comments and asking questions. He noted that, as this meeting was an introductory meeting, it would be most helpful to EPA and BIA to hear about key topics and areas that participants would like the Manual revision to cover as opposed to providing detailed comments on text or specific sections. He also noted that, because this Manual update process is not bound by the format of the Negotiated Rulemaking process, public comments would not be bound by specific time limits, but that it would still be best if commenters could keep their comments brief in order to allow other participants to also comment.

The following spoken public comments were received during the meeting, *with responses, if provided, from federal agency and Osage Minerals Council officials indicated in italics.*

- Joe Cheshewala, landowner, recently retired from BIA after 29 years: The way that you’ve got it written up Eddie, you don’t have people helping you out on anything. Are you going to be able to respond to spills, etc., with just your current staff? I want to make sure that you have sufficient capacity to do everything that you’re claiming that

you're going to do. *Eddie Streater, BIA: This document is not intended to go into staffing and other capacity concerns.*

- Bob Jackman: There is an omission in the agencies listed in the letters from the BIA to the Cattleman's Association and vice-versa, and in the participation in today's meeting. Where is the OERB [Oklahoma Energy Resources Board]? They should be here. They are a big part of site restoration here. They have the funds and resources to do site restoration. There's a bottleneck in communication between the BIA and telling the OERB about which sites should be cleaned up. There's a tremendous backlog. I wanted to point this out and ask why they aren't here, particularly since there are other representatives from the state here [representatives from the Oklahoma Corporations Commission and the Oklahoma Department of Environmental Quality were present at the meeting]. *Eddie Streater, BIA: This is an operations manual. We can engage OERB at a later date, but they aren't really part of the internal process between EPA and BIA. We are in communication with OERB.*
- Mark Helmer, producer in Osage County: Has there been any thought given to standardizing the SPCC [Spill Prevention, Control, and Countermeasures] forms? Currently 4 or 5 operators can turn one in, and they all look different. It creates a lot of extra work for us. We'd be happy to fill it out if it were standardized. *Eddie Streater, BIA: There's a fine line between making a new rule or not. But we can certainly entertain that suggestion, and we can discuss it further in the producers meeting. The 1997 manual says that "operator should submit a form" but it doesn't specify which form, or how many forms, or what it looks like, and so we can work with the operators to see how this should be done. This seems like something that would be possible to do.*
- Kerry Sublet, University of Tulsa: A couple of questions: when this manual is finalized, will the BIA have the authority to enforce these guidelines? *Vanessa Ray-Hodge, DOI Solicitor's Office: This is where we walk a fine line between a rule and interpretation of a rule. Generally the things that we include in the manual and handbook are designed to be guidelines, and when someone follows best management practices, they are guaranteed to be in compliance with the rules. But one option could be to interpret the rules to see how the operator should act on the ground. In the Handbook, we could define how operators should implement best management practices as a baseline to be in compliance with a certain regulation. If those minimums aren't being followed, then BIA can enforce those minimums. There may be things that the current regulations don't address, that may be new, and we can discuss areas that might work for everyone. For example, cattle bars. If everyone can agree on this, then we can include it in the*

handbook, but BIA couldn't enforce it if it isn't in the regulations. So there are some things that could be included that are grounded in the regulations, but there may be others that fall outside of the regulations.

- Kerry Sublet, University of Tulsa: So what I hear you saying is that there will be a distinction in the Manual between what's mandatory and what's recommended? *Vanessa Ray-Hodge, DOI Solicitor's Office: We'll have to look at that further. If there's a desire to include things that are beyond the scope of the regulations, we'll have to look at how to identify those.*
- Kerry Sublet, University of Tulsa: In the previous version of the handbook [the 1997 version], there was a section on surface restoration that doesn't seem to be in the current draft revised manual. *Willie Lane, EPA: There wasn't any intent to remove any language from the manual. All of the sections that were in the 1997 version of the manual should be carried over to the current draft revision, but this is something that we can look back at to make sure that we didn't miss anything.*
- Jeff Henry, Osage County Cattleman's Association: I want to thank everyone in front of us for including us in this process. Communication has improved drastically as compared to the Reg-Neg, and want to thank you all for that. You've given us contact info for yourselves, and Eddie, I've passed your contact info on to all of the cattlemen, so you'll be hearing from them. I really appreciate your bringing us into this process. How will this Handbook be enforced to ensure compliance? What is the relationship between the CFR regulations and this handbook? How will it be possible for the BIA to enforce certain best management practices and not others, and how will the BIA decide between those? *Vanessa Ray-Hodge, DOI Solicitor's Office: What we're doing with the Handbook is interpreting the current regulations. We don't know for sure whether the proposed regulations [that came out of the Negotiated Rulemaking process] will be enacted. There is nothing in the current regulations that references a manual or handbook. But there is language in the current regulations that requires operators to adhere to any orders from the Superintendent that supplement the regulations, and the Manual and Handbook could fall under that sort of guidance. There's a similar provision [regarding orders from the Superintendent] in the proposed regulations. Generally, regulations don't reference specific other, outside documents, but do reference outside documents generally, and once notice is given about something like the Manual, then those are binding on the operators. That's similar to orders that are issued by the Superintendent. Guidelines and policies are things that the agency will create that don't have to go through a*

rulemaking but that clarify and specify how to interpret the regulations. Generally, it's going to be a learning process for all of us as we learn how to go about this.

- Margot Grey, Shareholder: Just as technology changes, so should we. Is there a section here that we are dealing with technology and how we use it as we go forward? Since this hasn't been updated since 1997, it's important that we take advantage of broadband and spectrum in order to do high-speed internet, so that our tribe can get the best price. Thank you. *Eddie Streater, BIA: Thank you for your comment and suggestion.*
- Bob Jackman: Will the future meetings be publicized in all of the Osage County newspapers? Because there are a lot of landowners and operators that aren't members of the Producers Association or the Cattleman's Association that would be interested parties to this, but wouldn't be aware of this unless there are announcements and details in the Osage County newspapers. *Vanessa Ray-Hodge, DOI Solicitor's Office: For this meeting, we did try to get notice out to as many newspapers as we could. I think that we were a little bit short in getting it out to all of the newspapers by their deadlines in some cases. All of the public meetings will be posted on the BIA website as well as at the Agency. All of the public meetings will be posted in newspapers and otherwise publicized.*
- Rob Lyon, Osage Producers Association: I'm not sure whether this is in the scope of this document, but since we have a gentleman here from DEQ tonight, so I think that I'll mention it. There's nothing in here about Title 2, Tier 3, and it seems like it would be helpful if that was in here so that people can contact DEQ and provide the information that's required. It is all part of the environmental compliance process and it would be helpful to many operators to include that in here. Tom Birdman makes it so easy for me; in 15 minutes every year I'm done. Other operators could definitely benefit if that sort of information were to be included in the manual. *Eddie Streater, BIA: That's exactly the kind of input we're looking for here, and that's a good suggestion. Thank you.*
- Jeff Henry, Osage County Cattleman's Association: Will there be representatives from BIA, EPA, DEQ, and the Corporation Commission at the stakeholder meetings? *Vanessa Ray-Hodge, DOI Solicitor's Office: All of the people at the front table will be there, and we invite the state agencies. We cannot compel them to participate, but we would love to have their ongoing participation, and they are invited to join us.*

- Gary Marshall, land owner: Do the counties surrounding Osage County have similar manuals? We could use those for reference. *Eddie Streater, BIA: Not to my knowledge. Osage County is very unique in the whole country. There is no BLM oversight and no ONRR oversight into operations or management here. So that's why we do things like create these manuals here.*
- Ron Reed, surface owner: Who's going to make the ultimate decision about what goes into the Manual? *Vanessa Ray-Hodge, DOI Solicitor's Office: After we have the series of meetings through June, all comments and input will go back to EPA and BIA, and those agencies will decide what goes into Manual. The hope is that, while surface owners and producers sometimes have differences, we can open up a dialogue so that we can create a middle approach that both surface owners and producers can live with and then you all can come to us and say that you can both live with it. That way, EPA and BIA can say much more easily: "Yes, that should definitely go into Handbook." If producers and surface owners are very far apart, then that makes it harder for us to decide on where to land.*
- Mark Helmer, producer in Osage County: That's been happening for 35 years, because we have to live next to each other, and we do that anyways. I guess that we could all use a little more government in our lives. *Vanessa Ray-Hodge, DOI Solicitor's Office: It's great to hear that producers and landowners are already working together, and we want to build on that. It will be great to get your perspective on common standards that we can set that work for all parties. That's the type of cooperation that we're looking for and that we hope will guide this process.*
- Bo Carter, landowner: This is off-topic, but I was told that the appropriate parties would be here. About 11 or 12 years ago, Plains Property came through my property. Because part of the property has archeological value, they laid a pipe under my land and that went through my water table. I was assured that my water table wouldn't be affected, but it most definitely was. Now, I can't run the dishwasher and take a shower at the same time. I hired a geologist and his finding was that those three boreholes were the cause of the problem. I contacted various state and federal agencies and they all sent me in circles. The one thing that they agreed on was "comingling of strata", basically when a hole is bored, it has to be plugged. Now, because there's a pipeline, that's Corporation Commission, but they said that they couldn't do anything because it's in Osage County. All of those parties said that they couldn't do anything. They all did a square dance. Since all of the parties are here tonight, I wonder whether you all can figure out how to get my hole plugged. If you guys from the government, the

government regulatory agencies, have the power to enforce rules, then make Plains Pipeline plug my hole. *Eddie Streater, BIA: Thanks for your comments. We will follow up with you after the meeting.*

Adjournment

The meeting was adjourned at 7:45 pm on February 20, 2014.

Attachments

- A. Attendance
- B. Materials Distributed at the Meeting

Attachment A: Attendance

FEDERAL AGENCY OFFICIALS AND OTHER STAFF

Last Name	First Name	Title	Organization
Ray-Hodge	Vanessa	Attorney for DOI	Department of Interior, Office of the Solicitor
Streater	Eddie	Deputy Regional Director	Bureau of Indian Affairs
Loftin	Rhonda	Regional Trust Coordinator	Bureau of Indian Affairs/Eastern Oklahoma Regional Office
Hale	Jeannine	Superintendent	Bureau of Indian Affairs - Osage Agency
Lane	Willie	Section Chief - Enforcement Division	Environmental Protection Agency, Region 6
Coleman	Samuel	Deputy Regional Administrator	Environmental Protection Agency, Region 6
Kracher	Christina	Tribal Consultation Advisor	Environmental Protection Agency, Region 6
Kansal	Tushar	Facilitator	Consensus Building Institute

OSAGE MINERALS COUNCIL MEMBERS

Last Name	First Name	Organization
Bear	Curtis	Osage Minerals Council
Boone	Cynthia	Osage Minerals Council
Core	Melvin	Osage Minerals Council
Whitehorn	Dudley	Osage Minerals Council
Yates	Andrew	Osage Minerals Council

MEMBERS OF THE PUBLIC

Last Name	First Name	Title	Organization
Ben	Daniels		BIA Osage Agency
Bowline	Gene	Land Shareholder/Owner	
Bowling	Gaylen	Owner	
Butler	David	Oil Producer, OPA	Beckham & Butler
Carpenter	Ciaradon	OMC Asst. Shareholder/Landowner	
Carter	Bo	Rancher	
Cavall	David	NBI Chaparral Energy	Chaparral Energy
Chambers	Kathryn	Osage Co. Landowner	OCCA
Cheshewalla	Debbie	Landowner	Osage
Cheshwalla	Joe	Annuitant landowner	Osage
Clemishire	Chris	OPA	Osage
Cubbage	Will		OCCA
Dale	Jesse		BIA Osage Agency
Damron	Sharon	Osage Shareholder	
Drummond	Sandra	Osage Co. Landowner	Dick Drummond Ranch
Fuller	Rich	Wildlife Biologist-Energy Emphasis	OK Dept of Wildlife Conservation
Ganner	Roger		OCCA
Gillman	Kristen	Wildlife Lands and Mineral Coord.	OK Dept of Wildlife Conservation
Glory	Marey	Executive Secretary	OPA
Gray	Margo	Osage Shareholder	
Hamilton	Bob		OCCA
Helmer	Mark	Producer	Helmer Oil
Henry	Jeff	President	OCCA
Hurd Jr.	John		OCCA
Jackman	Bob	Own in Oil and Gas	Jackman, lusc
Johnson	Mary	Producer	CEP Mid Continent
Jones	Jill	Board Chair	Osage Nation Energy Services
Jones	Jann	Osage Nation ENR Director	Osage Nation
Keener	Travis	Principal Engineer	Hydration Engineering
Lloyd	Kirk	Director	OK DEQ
Lyon	Rob	President, OPA	The Link Oil Co.
Marshai	Gary	Landowner	
McClain	Ray	shareholder	
Reed	Ron	Surface	Reed Ravel

Rempe	John	Biologist	OK Dept of Wildlife Conservation
Renfro	Chad	shareholder	Osage
Rennick	Henry	Producer/Headright Owner	
Roach	Nona	President, Agape & Assocs., Osage Landowner	Agape and Associates
Scott	Jim		OCCA
Short	Mark	OPA	Short Oil Co.
Spurgeon	Chuck	OPA	Martin & Spurgeon
Storer	Fred	Principal	Hydration Engineering
Sublette	Kerry	Prof. of CHE	University of Tulsa
Swopes	Bobby	Landowner	
Thomas	Warren	Business Development	Sullivan & Co.
Tim	Baker	Manager, Field Ops.	OK OCC, OGCD
Voss	Grizz	Manager	Pronto Chemical
Wilson	Clay	Producer	

Attachment B: Materials Distributed at the Meeting

1. [February 20, 2014 Meeting Agenda](#)
2. [Draft Osage Operators Manual](#)
3. [Process Guidelines](#)